

Highly Confidential - Subject to Further Confidentiality Review

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION

4 - - -

5 IN RE: NATIONAL :
6 : MDL No. 2804
7 OPIATE LITIGATION :
8 : Case No.
9 :
10 : 1:17-MD-2804
11 THIS DOCUMENT RELATES :
12 TO ALL CASES : Hon. Dan A. Polster
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10 : Friday, December 21, 2018

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1 Q. Okay. Why not?

2 A. Because we do have a procedure --

3 what happened here is that -- this was tied to

4 our VAWD accreditation. And there's some

5 background on that. We thought we needed to

6 have this VAWD accreditation. VAWD stands for

7 Verified Accredited Wholesaler Distributor.

8 And this accreditation is for

9 anybody who's selling, you know, medications.

10 It was a requirement by a payer to have this in

11 place. There was a gray area there in our

12 interpretation. And I'll answer your question.

13 It's just some background there.

14 Q. No, no. Please continue.

15 A. There was a gray area there that

16 we did not -- since we're a distributor to our

17 own stores, whether we needed that. Because

18 we're not distributing to a customer.

19 Essentially our stores, I guess, are our

20 customer.

21 So we didn't think we needed it.

22 It was recommended that we go through this VAWD

23 accreditation process. We got halfway through

24 that process. The payer said, "No, you don't

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1 CERTIFICATE
2 STATE OF OHIO :
3 SS:
4 COUNTY OF FRANKLIN :
5 I, Carol A. Kirk, a Registered Merit
6 Reporter and Notary Public in and for the State of
7 Ohio, duly commissioned and qualified, do hereby
8 certify that the within-named PETER RATYCZ was by me
9 first duly sworn to testify to the truth, the whole
10 truth, and nothing but the truth in the cause
11 aforesaid; that the deposition then given by him was
12 by me reduced to stenotype in the presence of said
13 witness; that the foregoing is a true and correct
14 transcript of the deposition so given by him; that the
15 deposition was taken at the time and place in the
16 caption specified and was completed without
17 adjournment; and that I am in no way related to or
18 employed by any attorney or party hereto or
19 financially interested in the action; and I am not,
20 nor is the court reporting firm with which I am
21 affiliated, under a contract as defined in Civil Rule
22 28(D).
23
24

IN WITNESS WHEREOF, I have hereunto set my
hand and affixed my seal of office at Columbus, Ohio
on this 27th day of December 2018.

CAROL A. KIRK, RMR
NOTARY PUBLIC - STATE OF OHIO
My Commission Expires: April 9, 2022.
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Golkow Litigation Services